State Reporting Burden Reduction and Measures Streamlining Initiatives

Joint EPA/ECOS Briefing for Marcus Peacock
March 16, 2007

Outline

- Progress to Date

- Overview of Results and Recommendations
  - Burden Reduction
  - Measures Streamlining

- States' Perspectives

- Key Milestones

Background

- The Environmental Council of States expressed concerns over the continued increases in state reporting during EPA's internal FY08 budget discussions.

- In response to states' concerns, EPA initiated two complementary efforts to assess and adjust reporting requirements and measures.

  Burden Reduction Initiative: states list their top five high-burden, low-value reporting requirements (OCIR).

  Measures Streamlining Initiative: states and regions identify measures for modification or elimination (OCFO).

Progress to Date

- Developed "emergency" ICR; received OMB approval (Oct 11).

- DA memo to State Commissioners and Regional Administrators (Oct 11).

- States submitted recommendations (Nov 22).

- Regions submitted recommendations on measures streamlining (Dec 6).

- Regions and NPMs provided their assessments (Dec-Jan).

- Analyzed, grouped and summarized all the data (Jan-Feb).

- Reviewed results during full P & P Workgroup call (Mar 12).

- How is this different from previous efforts?
  - EPA's sustained focus and commitment.
  - Broad involvement of the states, regions, and NPMs.

Overview of Recommendations

Burden Reduction - 38 states provided 239 specific recommendations.

- – <u>By program:</u> Air (20%); Water (34%); Solid and Hazardous Waste (12%); Enforcement & Compliance (18%); Pesticides and Toxics (1%).

- – <u>By type:</u> Grants-related (23%); Electronic Reporting (29%); Region-specific (8%); Programmatic (40%).

ACS Measures Streamlining
- 15 states identified 53 measures for streamlining (mainly OW).
- EPA regions provided 504 comments on 238 measures (mainly OW & OECA).

General Themes
- Reduce reporting frequency.
- Eliminate duplicative reports and ones that are not used.
- Improve efficiencies of EPA's databases; provide for more electronic submissions, not paper; EPA should directly access databases instead of requiring duplicative reporting.
- Limit number of performance measures (net reduction/no net gain).
- Reduce variations in regional reporting requirements.

Burden Reduction Results

20% (46) of the states' recommendations can be implemented in FY08 or earlier.

In the short term, EPA will:

- Implement 50% of all region-specific recommendations.*
- Streamline regional CAA sec.105 grant reporting.*
- Eliminate redundant reporting (PSD/NSR, CAA 112(g)).*
- Reduce reporting frequency for state program grants and MBE/WBE reporting.
- Improve database efficiencies:
    - RCRAInfo;
    - SDWIS;
    - Air Emissions Database and National Emission Inventory reporting (database and regulatory overhaul).

*Priority for the states.

Process Next Steps

- EPA will work with programs, regions and states <u>on the other 80%</u> of the recommendations and ensure that decisions on all recommendations are transparent.

- EPA will establish priorities/schedules and develop an implementation plan to:
    - Achieve timely results;
    - Seek involvement (via ECOS) of the environmental media associations;
    - Track progress through periodic status reports and meetings with senior EPA and ECOS leaders; and
    - Quantify the burden reduced.

Upcoming Challenges

- Ensure that difficult recommendations (i.e., those requiring statutory and regulatory changes) will receive serious consideration by EPA's senior leadership. Examples:

    - Reduce frequency of CWA 305(b) & 303(d) integrated reports (22 states).*
    - Non-point source report is duplicative, expensive and time-consuming.*
    - Eliminate: annual non-compliance and public water system compliance reports.*

- Ability to implement many recommendations will require more focused discussion with EPA's senior leadership.

*Priority for the states.

States' Perspectives

- Applaud EPA for addressing state reporting burden.

- Feel state efficiency is critical now due to continued STAG cuts. Also critically important:
  - Equitable budget cuts (between STAG and EPA's non-STAG)
  - Resolution of state grant award timeliness
  - No more new EPA initiatives.

- Focus on improvements across the general themes.
  - Seriously consider recommendations regarding CWA 303(d)/305(b).
  - Timely and significant implementation, including:
    - Interim status reports beginning June 2007; and
    - Update from you on implementation progress and results at the ECOS Annual Meeting in Sept.
  -

Measure Streamlining Results

- 15% net reduction in measures from FY07 to FY08 (402 vs. 342 as of 3/8/07)

- 131 FY07 measures deleted
  - most from OAR, OECA, and OW.
  - OW has largest number (49).

- 71"new" measures
  - Majority are adjustments/not new work (e.g., OW deleted 4 drinking water measures and replaced them with 2 "new" ones).
  - Others represent current work previously not in ACS.
  - Some added to support EPA's revised Strategic Plan (e.g., 20 new OW measures are "place-based" and impact small subset of states/regions).

Measures Streamlining: #s by NPM

Proposed FY 2008 ACS Measures (as of 3/7/07)							
Program Office	OAR	OW G2	OW G4	OSWER	OPPTS	OECA	Total*
FY2007 Measures	88	120	33	34	25	99	402
FY2008 Measures	68	83	51**	33	23	81	342
Change in total	-20	-37	18	-1	-2	-18	-60
Percent Change	-23%	-31%	55%	-3%	-8%	-18%	-15%
FY08 Details							
New	21	10	20	3	10	7	71
Delete	41	47	2	4	12	25	131

*Total number of measures for FY07 and FY08 include 3 performance track measures, which are not accounted for in the NPM counts.

** The 20 new measures proposed by OW in Goal 4 are to address place-based priority areas, as outlined in Goal 4 of the EPA Strategic Plan, and apply only to a small subset of regions/states

Measure Streamlining Results
Impact of Changes

- Increased collaboration between EPA & states—most comprehensive review of Agency's measures.

- Greater transparency.

- Better set of measures—improved clarity and smaller number.

- Some burden reduction:
  - States benefit from deleted OW measures.
  - HQ/regions benefit from decrease in ACS reporting.

Implications for States

- EPA refining list of "state-related measures."
  - Almost half of ACS FY08 measures are "state-related."
  - Significant number deleted from FY07 to FY08.

- State Grant Template measures increase by 1 from FY 07 to FY 08.

Comparison of FY07 to FY08 State Grant Template Measures (as of 3/6/07)						
NPM	**OAR**	**OW**	**OSWER**	**OPPTS**	**OECA**	**TOTAL**
# of FY07 State Grant Template Measures	14	31	8	2	7	62
# of Template Measures Deleted	0	12	0	0	0	
# of Template Measures Added	0	9	0	1	3	
Net Change from FY07 to FY08	0	-3	0	(+) 1	(+) 3	(+1)
FY08 Total	14	28	8	3	10	63

States' Perspectives

- Applaud EPA's goal of improving measures, and EPA's efforts to increase state involvement.

- State Impact of ACS must be clear:
  - The impact of each ACS measure on states is not clear.
  - State impact needs to be clear in order for states to participate in a meaningful way.

- What can be done?
  - States need assistance from EPA to translate impact of ACS measures on what EPA will expect of states.
  - EPA's efforts currently underway are headed in the right direction – but probably too late for this year.

- Regarding FY08 State Grant Template:
  - Pleased that burden increase from FY07 looks minimal, and
  - Request opportunity to work with EPA senior leadership on state and EPA accountability.

Key Milestones

- Rollout at ECOS spring meeting (Mar 21).

- Comments on NPM guidance (including FY08 measures) due to NPMs (April 6).

- NPM guidance finalized (April 27).

- DA communication on results and implementation (May).

- Develop and begin implementing plan for the next phase of the burden reduction effort (May).

- NPM/region commitment process (target negotiations) (Summer).